Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
Implementation of the Pay	)	
Telephone Reclassification and	)	CC Docket No. 96-128
Compensation Provisions of the	)	
Telecommunications Act of 1996	)	

REPLY COMMENTS OF THE AMERICAN JAIL ASSOCIATION
IN OPPOSITION TO THE WRIGHT PETITION FOR RULEMAKING

The American Jail Association ("AJA"), a national, nonprofit organization of jail administrators, sheriffs and corrections officers, opposes any initiative that would threaten to undermine the existing system of inmate phone service that is so vital to our ongoing national security efforts. The Wright Petition,[1] which proposes to replace current inmate calling arrangements with mandated, federally-regulated access by any telecommunications carrier to this nation's jails and prisons, would subvert the responsibilities and security decisions of state and local correctional officials. For this compelling reason, the Petition should be denied.

DISCUSSION

The Wright Petition was submitted by various prison inmates who are incarcerated at three privately-administered correctional facilities operated by Corrections Corp. of America ("CCA") in Arizona, New Mexico and Ohio. The Petition asks that the Federal Communications Commission ("FCC" or "Commission") make exclusive service arrangements for inmate tele-communications unlawful, permit open access by multiple interexchange carriers, and mandate

[1] *In the Matter of Martha Wright, et al.*, Petition for Rulemaking or, in the Alternative, Petition to Address Referral Issues Pending Rulemaking, DA 03-4027 (rel. Dec. 31, 2003), 69 Fed. Reg. 2697 (Jan. 20, 2004).

the offering by inmate telecommunications providers of debit card alternatives to collect calling. Yet the FCC has for more than a decade recognized that inmate calling services occupy a unique position, facing extraordinary security challenges,[2] and that the Commission should accordingly defer to the judgment of prison administrators with respect to the provision of inmate calling services. The Petition offers the same complaints of "excessive" rates — which the Commission has repeatedly rejected in the past[3] — but provides no basis on which to find that there are any technologically and economically viable alternatives to the existing system of exclusive providers.

That is because the exclusive provider system for inmate services has developed precisely to meet the exceptional security issues facing correctional administrators. As this Commission has explained, "the provision of inmate calling services implicates important security concerns."[4] Under the current system, one inmate phone service provider is contractually committed to monitor and control inmate calling to prevent abuse of the public and assist in criminal investigations. Carrier choice, as proposed in the Petition, would cause the facility to lose control over the monitoring and tracking of inmate calling, resulting in ongoing criminal activity and massive fraud. Carrier choice would also undermine the ability of telecommunications providers to assist law enforcement officials in ongoing criminal investigations. The FCC has long agreed, calling these "exceptional" circumstances that support "special security requirements applicable to in-

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[2] *See Policies and Rules Concerning Operator Service Providers,* Report and Order, 6 FCC Rcd. 2744, 2749-52 (1991).

[3] *See, e.g., Billed Party Preference for InterLATA 0+ Calls,* Second Report and Order on Reconsideration, 13 FCC Rcd. 6122, 6156 (1998) (*"Billed Party Preference Order"*); *Amendment of Policies and Rules Concerning Operator Service Providers and Call Aggregators,* Report and Order, 11 FCC Rcd. 4532 (1996) (recognizing "the 'exceptional' circumstances presented by the correctional environment").

[4] Order on Remand and Notice of Proposed Rulemaking, *Implementation of the Pay Telephone Reclassification and Compensation Provisions of the Telecommunications Act of 1996,* 17 FCC Rcd. 3248, 3276 (2002).

mate calls,"[5] and rejecting proposals for applying Billed Party Preference to inmate phone services.

As AJA has previously commented on these matters, "the purpose and use of inmate telephones bears little resemblance to the purpose and use of telephones by the general public. Generally, the use of a telephone by an inmate is a privilege, not a right."[6] There is no question that American society

> will not tolerate a system that allows inmates to have free and open access to the telecommunications network. New crimes could be committed and old ones could be continued. Witnesses, judges, juries, and prosecutors would be intimidated, and victims could be harassed. For this reason, we do not allow inmates to use access codes to reach the carrier of their choice, nor are we required to allow such dialing under applicable FCC rulings.

AJA Billed Party Preference Comments at 1. At the same time, allowing inmates access to telephone communications can serve rehabilitation purposes by strengthening positive relations between inmates and their families.[7] The goal of correctional officials, therefore, is to achieve a balanced system that encourages frequent inmate calling but which effectively controls that calling to protect the public from abuse of the telephone by inmates for criminal purposes.

The open access system proposed by the Wright Petition would strike at the heart of this balance, usurping the decisions committed by our federal-state system to the experience,

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[5] *Billed Party Preference Order,* 13 FCC Rcd. At 6157.

[6] Letter from Stephen J,. Ingley, AJA, to Chairman Reed E. Hundt, FCC, July 26, 1994 ("AJA Billed Party Preference Comments"). For the convenience of the FCC's Staff, a copy of these *ex parte* comments is attached.

[7] AJA does not disagree, therefore, with commenters who emphasize that allowing inmates to spend time on the telephone "strengthen[s] ties with their community and reduc[es] the chance of recidivism." ACLU Comments at 5; *see* Ad Hoc Coalition for Right to Communicate Comments at 19-29. The problem is that these commenters ignore that courts have uniformly rejected constitutional and antitrust challenges to the single-provider system for inmate calling — *see, e.g., Arsberry v. State of Illinois,* 244 F.3d 558 (7th Cir. 2001); *Washington v. Reno,* 35 F.3d 1093 (6th Cir. 1994); *Daleure v. Kentucky.* 119 F. Supp. 683 (W.D. Ky. 2000); *Carter v. O'Sullivan,* 924 F. Supp. 903 (C.D. Ill. 1996); *Feigley v. Public Utils. Commn.,* 794 A.2d 428 (Pa. 2002) — and that the issue of excessive rates can and should be handled, as addressed below, by direct regulatory intervention against providers who charge unreasonably high inmate service prices.

judgment and discretion of state and local corrections officials. Indeed, the Petition unabashedly argues, without any factual basis, that single-provider collect calling arrangements "are not necessary in order to enforce prison security or to carry out related penological goals." Petition at 11. Perhaps more importantly, the Petition would substitute an FCC-regulated system of access — under which providers of inmate calling "platforms" would be compensated at Commission-prescribed rates — for the current integrated scheme, under which a single provider is responsible for providing equipment and services to support inmate calling services.

This would eliminate the financial base for specialized inmate calling systems and ***jeopardize the very existence of inmate phones.*** The FCC must recognize that only 15 years ago, specialized inmate calling systems were generally not available to our nation's jails. Indeed, a fair proportion of jails in rural areas faced the situation in which the independent local telephone company refused to provide inmate phone services. Correctional officials in any event had no way to effectively control inmate calling at a facility except to require strict officer supervision of all inmate calls and to severely limit inmate access to what was frequently a single phone per institution. Until the technological development of the inmate calling systems used today, therefore, families of inmates rarely, if ever, received a call from their loved ones in jail.

Without the revenue streams made available through the exclusive provider system, the production and deployment of this specialized technology might no longer be economically feasible. The analysis offered by Dr. Jeffrey Eisenach of CapAnalysis, which questions the so-called "free rider" effect of the Petition's proposal, is both accurate and alarming,[8] as it suggests strongly that under an open access scheme the costs of developing, maintaining and installing

[8] Jeffrey A. Eisenach, *et al.*, "Mandatory Unbundling: Bad Policy for Prison Payphones," March 9, 2004, at 17 (Exhibit B to Comments of T-NETIX, Inc. (March 10, 2004)).

inmate calling systems would be unrecoverable, forcing platform providers out of the market. That result would be devastating to AJA's members, as in the period since enactment of the Telecommunications Act of 1996, the number of independent phone providers serving county jails has already dropped from several dozen to barely a handful. The long-term availability of inmate phone service to smaller jails and prisons in many states is already in question today. Under the Wright Petition approach, it would not be economically practical to provide service to many of these facilities.[9] The end result would be a return to an era in which inmates lacked routine access to telephones, a result that is in no one's interests.

As the RBOC Coalition explains, corrections administrators are charged with deciding whether to "require inmate providers to recover their costs from callers, accept lower commission payment, or defray some portion of the provider's costs in order to keep rates as low as possible . . . based on security concerns, corrections policy and other public policy considerations."[10] Under any scenario, however, it is a simple fact that America's jail officials cannot afford to provide inmate telephone equipment that has the necessary security controls without the assistance of inmate phone service providers. Our nation's jails are in a state of financial crisis, struggling to maintain sufficient funding even for basic needs. If this Commission acts to remove or limit the revenue stream supporting inmate phone service providers, we predict there will be few, if any, phones available for exclusive inmate use. That would send confinement and rehabilitation policy in this country back to the "dark ages," before inmate calling systems were available,

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[9] *See, e.g.,* Evercom Comments at 4 (describing how single-provider system enables carriers to bid for large blocks of traffic, allowing small and rural facilities to "have access to the same connection rates" as larger prisons).

[10] RBOC Payphone Coalition Comments at 5.

when calls to or from inmates were largely limited only to brief, constitutionally mandated communications with counsel.

Proponents of the open access system use pejorative rhetoric to explain that they believe the Petition's proposal are justified because of rate concerns. *See, e.g.,* ACLU Comments at 4 ("[c]arriers increase their calling rates to some of the highest rates in the country to recoup the commissions"); Ad Hoc Coalition for Right to Communicate Comments at 9, 13 (criticizing "the bloated nature of [inmate calling] charges" and "[e]xhorbitant, commission-driven phone rates, made possible by exclusive dealing arrangements"). They also, however, take issue with security arrangements, including call blocking, that are integral to the mission of correctional administrators. ACLU Comments at 11. And they inappropriately confuse families of incarcerated prisoners with the inmates themselves — whose access to communications is at issue — in emotionally arguing that "family members and friends that pay to receive calls from inmates are consumers of telecommunications services and have committed no crime." CURE Comments at 7; NASUCA Comments at 2 (Commission should protect "the recipients of inmate calls who, while not behind bars, are the last consumers truly captivated by a monopolistic payphone market").

None of this rhetoric, well-meaning as it is and consistent in some other respects with the penological and rehabilitation objectives of modern correctional administration, accepts the reality that security of inmate communications is an overriding issue and that, without adequate security, inmate phone service itself would be impossible. The exclusive provider system has, over the past two decades, developed the technological and economic means to provide frequent calling opportunities to inmates and their families, despite strained and shrinking state and local correctional finances. Only the most egregious circumstances, beyond complaints about

unreasonable rates, should justify interfering with the workable system that has produced such positive results.

The Wright Petition suffers from other flaws as well. First, its claim that the exclusive provider system could be redesigned within one year to permit multiple carrier access ignores significant cost differences among correctional facilities of varying size.[11] Second, it fails to recognize that there is no technical means under an open access system to assure that all inmate calls are identified as such and are subject to the monitoring and security controls required by administrators.[12] Third, the Petition's proposal that the FCC eliminate commissions except to reimburse correctional systems for the actual expenses incurred in providing inmate calling services represents an unnecessary (and possibly unlawful) interference in the legitimate corrections funding decisions by state and local legislatures and executive branch agencies in determining the structure of service rates, the use of revenues, and the balance between taxpayer and end user funding of inmate telecommunications equipment.[13]

Fourth, the Petition ignores that mandating debit card arrangements will add significant new capital and operating expenses to already strapped correctional systems, limiting the price benefits, if any, available with that approach.[14] Fifth, the Petition fails to reflect the fact that

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[11] *See* New Jersey Department of Corrections Comments at 2 (Feb. 6, 2004); New York State Department of Correctional Services Comments at 7-11 (March 9, 2004).

[12] *Id.* As other expert testimony in the record reveals, "the introduction of multiple interexchange carriers [to inmate calling] will open the system to risks of fraud and abuse." Declaration of Peter Bohacek and Charles Kickler, Jr., at ¶ 3 (Attch. A to CCA Comments). *See also* Assn. of Private Correctional and Treatment Organizations Comments at 14-15 (March 10, 2004) (Wright Petition places "all of the security burdens on the prison and its chosen inmate service provider and the competitive carriers are not held accountable and have no incentive to ensure that security needs are met").

[13] New Jersey DOC Comments at 1.

[14] CCA Comments at 19. "[T]he administrative cost for implementing a debit card system is high, and some state and local correctional facilities cannot meet its burden." CCA Comments at 18.

under an open access system, there is no guarantee, and little economic incentive, for multiple carriers to serve small facilities with very little telephone traffic. As the New York State DOCS notes, those inmates "could be left with no service whatsoever" and the end result would be "calls from one facility costing substantially more than telephone calls from a facility that is less than one mile away."[15] Finally, the Petition fails to reflect the fact that responsible prison administrators are constantly looking for ways to improve their treatment of inmates and, to that end, have in many cases added "direct billing and prepaid services" for inmate calling services.[16]

These are precisely the sort of penological decisions that are and should remain the province of local corrections administrators. CURE, for instance, argues that this Commission should "determine" whether the "legitimate security functions" of corrections facilities "could be satisfied when more than one carrier provided calling services in a prison." CURE Comments at 8. Yet CURE fails to appreciate that the security requirements, and corresponding technological solutions, vary widely among correctional facilities of different sizes and in different urban, suburban and rural locations. Moreover, as AT&T notes, debit card accounts create a risk that inmates may use physical threats to coerce another inmate's friends or family to deposit funds into debit accounts and can exacerbate internal administration problems because corrections officials would be responsible for provisioning and billing of debit card accounts. AT&T Comments at 9. The New York State Department of Correctional Services agrees, noting that debit card systems increase opportunities for inmate extortion because "[i]n a system where an inmate has a debit card, that inmate has money."[17] And debit card accounts increase the administrative bur-

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[15] New York State DOCS Comments at 8.

[16] Kansas Department of Corrections Comments at 1 (Feb. 4, 2004).

[17] New York State DOCS Comments at 9.

den on corrections officials, for instance in managing frequent transfers of inmates among different facilities.[18]

Rhetorical challenges to the financing of inmate telecommunications systems — *e.g.*, NASUCA Comments at 7 ("prisons across the country have become profit centers for state treasuries") — only obscure the reality that the balance between taxpayer and user funding of inmate telecommunications systems is a delicate policy issue that is appropriately left to the judgment of state and local legislatures. Some states, such as New Mexico, have by statute limited commissions payable on inmate phone services. Inmate families and consumer advocates therefore have ready political venues in which to press their claim that commissions should be declared unlawful. That they have generally failed to date largely reflects the undeniable fact that this nation's costs of maintaining incarcerated inmates are already so high that limiting revenue opportunities for correctional systems is generally viewed as unacceptable. However, those decisions have been and should continue to be made by elected state and local representatives, not federal administrative agencies.

The choice of which sort of calling system is most appropriate for a particular institution or correctional system requires a detailed knowledge of local incarceration, budget and staffing considerations, something not possible on a national basis or from an agency like the FCC that lacks expertise in penological matters.[19] Correctional facilities have every incentive to implement pre-paid debit accounts to the extent this approach reduces costs, eliminates collection

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[18] New York State DOCS Comments at 8.

[19] Some commenters address the question whether the FCC has the power to prohibit exclusive contracts under the Communications Act. WorldCom, Inc. d/b/a MCI Comments at 11-14; RBOC Payphone Coalition Comments at 7-10. AJA lacks expertise to comment on this complex issue of communications law, but agrees that the traditional deference shown by the Commission to corrections administrators is consistent with the power and responsibility of state and local governments to operate jails and prisons, a quintessential government activity.

problems, and does not create unacceptable security risks. The Supreme Court, however, has appropriately emphasized that the judiciary is "ill equipped" to deal with "the difficult and delicate problem of prison management." *Thornburgh v. Abbott,* 490 U.S. 401, 407-08 (1989). No less is true of the Commission.

Nonetheless, AJA agrees that inmate families should not be forced to pay unreasonable rates for inmate calls.[20] In fact, the positive effects of frequent inmate calling that administrators desire can only occur if the rates for inmate calls are affordable. To the extent the FCC is concerned that certain providers are charging unreasonably high rates, the Commission should use its existing regulatory authority, through the complaint process, to directly regulate the rates of those providers. It should not, however, seek to mandate the sort of wholesale, structural changes to the inmate calling market proposed in the Wright Petition. Doing so would only, we believe, replace whatever complaints the Commission now receives about inmate service rates with a much larger mountain of complaints, generated by angry inmate families who can no longer communicate frequently with their loved ones in jail facilities and from law abiding citizens who become new victims of increased telephone fraud and crime.

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[20] NASUCA suggests that rates for collect calls placed by inmates are "exorbitant (and unregulated)." NASUCA Comments at 5. Yet like all telecommunications rates, whether for a Bell Company or a competitive local or long-distance carrier, rates for inmates service provides are subject to regulation at both the state and federal level. Many state commissions have imposed "rate caps" on inmate service prices and some inmate service providers, such as T-NETIX, have supported the concept of an FCC-mandated rate cap for interstate services. Unless and until direct regulation of rates is attempted and proven unworkable — a conclusion that can only be reached after actual experience with rate complaints —the Commission should not even consider the more radical, structural market changes proposed in the Wright Petition.

CONCLUSION

For all these reasons, the Commission should reject the Wright Petition proposals for mandatory federally-regulated access by any telecommunications carrier to the inmate calling systems serving this nation's jails and prisons.

Respectfully submitted,

AMERICAN JAIL ASSOCIATION

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Dated: April 21, 2004

EXHIBIT A

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July 26, 1994

The Honorable Reed E. Hundt, Chairman
Federal Commu ications Commission
1919 M Street N.W.
Washington, D.C. 20554

RE: C Docket No. 92-77 - Billed Party Preference

Dear Chairman Hundt:

The American Jail Association (AJA) strongly opposes the application of Billed Party Preference (BPP) at jail facilities. BPP will destroy the commendable achievements jail professionals have made over the last decade to encourage frequent telephone use by inmates, to prevent criminal activity over the telecommunications network, and to develop needed and effective inmate programs.

AJA is a national, nonprofit association whose membership consists mainly of sheriffs, jail administrators, and corrections officers. There are more than 3,700 jails nationwide, housing some 450,000 inmates on any given day, and processing 20 million admissions and releases every year. We are committed to ensuring that our nation's jails are orderly, secure, and effective rehabilitation centers. Our members have an important public mandate to maintain a safe and secure environment within their facilities, and to protect the general public outside of their facilities from criminal activity by inmates. The application of BPP at jail facilities will severely limit our members' efforts to fulfill these duties.

You must understand that the purpose and use of inmate telephones bears little resemblance to the purpose and use of telephones by the general public. Generally, the use of a telephone by an inmate is a privilege, not a right. There are obvious reasons why this is the case. Our society will not tolerate a system that allows inmates to have free and open access to the telecommunications network. New crimes could be committed and old ones could be continued. Witnesses, judges, juries, and prosecutors could be intimidated, and victims could be harassed. For this reason, we do not allow inmates to use access codes to reach the carrier of their choice, nor are we required to allow such dialing under applicable FCC rulings.

At the same time, there are reasons why we want to encourage the use of

the telephone by inmates, since frequent calling can be a positive rehabilitation tool. Indeed, frequent calling can encourage and strengthen positive relationships between inmates and their families--relationships that are vitally important for successful rehabilitation. Frequent calling can also help improve inmate morale which, in turn, encourages a disciplined and orderly jail environment and makes the corrections officer's already difficult job more manageable.

The goal, therefore, is to achieve a balanced system that encourages frequent inmate calling, but effectively controls that calling to protect the public from the abuse of the telephone by inmates for criminal purposes. Over the last decade, our members have been successful at implementing systems that achieve this goal. We do so through two required steps: (1) by routing inmate calling traffic to a single carrier that is qualified and equipped to handle inmate calls and who is contractually obligated to respond to our specific needs, and (2) by installing technologically-advanced inmate calling systems that allow frequent, but controlled, inmate calling. BPP is a direct assault to both of these precautionary measures.

Under the current system, inmate calling traffic is routed to a single carrier--one that knows the call is coming from a jail facility and one that generally automates call processing, or provides operators that are specifically trained, to thwart attempts by inmates to place prohibited calls. These carriers stay in daily contact with their contracted facility. This is an important reason why criminal telephone activity from inmate facilities can be detected and stopped at an early stage. For example, if an administrator receives information indicating that fraud or another crime has been, or is about to be, committed by an inmate through the use of the telephone, the administrator immediately informs the carrier who takes prompt action by either blocking specific numbers or denying service to the affected inmates by rejecting their Personal Identification Numbers (PINs).

Such responsive action could not be taken under BPP, since there could be dozens of different carriers that could carry inmate calls, none of whom will have any obligation to the facility. It would be impossible for every carrier to be in direct communication with every jail throughout the nation. And even if such

communication was possible, carriers under BPP will not be under any obligation to respond to an administrator's request to block calls to specific numbers or deny service to particular inmates.

Under BPP, the jail administration will no longer have the right to contract with a carrier that the administration has determined -- in his or her discretion -- is best equipped and qualified to handle the calls from that particular facility. In fact, BPP will grant inmates the right to access the network of dozens of different carriers by coordinating that selection with outside accomplices. All it will take is for a single inmate to find an unsuspecting carrier or a small independent telephone company that is ill-equipped and untrained to handle inmate calls, and we submit that as the identity of that carrier or telephone company becomes widely known, there could be a major outbreak of telephone criminal activity from our jails.

Of course, the magnitude of this potential harm ultimately depends on whether inmate phones will still be available after BPP, and if so, to what extent. BPP would eliminate the financial base for specialized inmate calling systems and jeopardize the very existence of inmate phones. Your agency should note that not more than a decade ago, specialized inmate calling systems were generally not available to our nation's jails. Indeed, a good number of jails are in rural areas where the small independent local telephone companies refused to provide inmate phone service. Jails had no way to effectively control inmate calling at the facility except to require strict officer supervision of all inmate calls and to severely limit inmate access to what was frequently a single phone per institution. Indeed, it was not that long ago that families of inmates rarely if ever, received a telephone call from their loved ones in a jail. And if they were so lucky to receive a call, inmates were forced to do so under the presence of a jail officer.

Recent advancements in technology, coupled with the advent of telecommunications competition, have changed that troubling condition. Inmate phone service providers have made it possible for administrators to provide equipment with the necessary controls that in turn, provide frequent and unsupervised inmate calling opportunities. BPP, however, is purposely designed to take away an inmate phone service provider's revenue base.

In addition to the above, many of our nation's jails receive commissions from the telephone providers. Often, the revenues generated from the inmate telephone service are placed in what is known as an "Inmate Welfare Fund (IWF)." The revenues contained in this fund must be utilized in programs that benefit inmates. Examples of such programs are drug and alcohol treatment, literacy training, G.E.D., vocational, etc. BPP will eliminate telephone commissions paid to jails, which in turn, will eliminate many of the existing inmate programs, since these programs have no other funding source.

If we can emphasize any point, let it be this: We can only allow frequent inmate calling if that calling is controlled. **Our jails cannot afford to provide inmate telephone equipment that has the necessary controls without the assistance of inmate phone service providers.** Our nation's jails are in a state of financial crises. We are struggling to maintain sufficient funding for even our most basic needs. We simply cannot afford to purchase costly inmate calling systems on our own. If you take away the revenue stream supporting inmate phone service providers, we predict there will be few, if any, phones available for exclusive inmate use.

Despite our opposition to BPP, AJA agrees that inmate families should not have to pay unreasonable rates for inmate calls, the apparent reason why your agency is even considering applying BPP to inmate facilities. In fact, the positive effects of frequent inmate calling that administrators desire can only occur if the rates for inmate calls are affordable.

To the extent that the FCC is concerned that there are certain providers that are nevertheless charging unreasonable rates, the FCC should use its enforcement powers to directly regulate the rates of those providers. The FCC should not, however, adopt BPP in an indirect attempt to regulate the rates for inmate calls since, as explained above, BPP will jeopardize security and potentially eliminate the very inmate calling systems from which those calls are made. Indeed, should BPP be extended to inmate facilities, we suspect that whatever complaints about inmate calling rates your agency currently receives will be replaced by a much larger mountain of complaints. These complaints will be generated by angry inmate families who no longer can communicate frequently with their loved ones in jail facilities and from law abiding citizens who will become new victims of increased telephone fraud and crime.

We respect your agency's responsibility to regulate our nation's communications systems As the Chairman of that agency, you no doubt have an awesome task. At the same time, please consider our membership's responsibility to manage and control our nation's jails. Ours is also an important task. BPP will take away important jail security and administration tools that assist us in the performance of our duties. Therefore, we urge that you do not extend BPP to jail facilities.

Sincerely,

Stephen J. Ingley
Executive Director

cc: The Honorable James H. Quello
The Honorable Andrew C. Barrett
The Honorable Rachelle B. Chong
The Honorable Susan Ness
AJA Board of Directors